

Hon. Frederic Block
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

VIA ECF

February 24, 2017

**Re: 2519658 Ontario Inc. v. 187 North 8 Street Owner LLC, et al.,
Case No. 1:16-cv-03170**

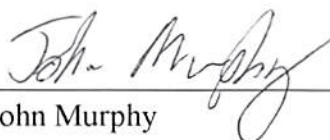
Dear Judge Block

We have just been retained to represent defendants, 187 North 8 Street Owner LLC, Michael Kohn and Bernardo Kohn (collectively, "Defendants"), in the above-referenced action. With Plaintiff's consent, we write pursuant to Your Honor's Individual Motion Practices to request a two-week extension of time for Defendants to respond to Plaintiff's motion for a default judgment, the opposition to which is due on February 27, 2017.

Yesterday, Defendants notified counsel for Plaintiff that there is no diversity in this action, as both Plaintiff and Defendant Bernardo Kohn are Canadians. Defendants have provided proof of Mr. Kohn's citizenship and requested that Plaintiff voluntarily withdraw the action. An extension is needed so that Plaintiff can evaluate and respond to this request or otherwise allow Defendants sufficient time to respond to the motion for default judgment. There have been no prior requests for an extension, and Plaintiff has consented to Defendants' request for an additional two weeks. Accordingly, the parties seek to adjourn the time for Defendants to respond to the motion for default judgment from February 27, 2017 until March 13, 2017.

We thank the Court for its time and attention to this matter and are available by phone should the Court require a conference.

Respectfully submitted,


John Murphy

cc: Counsel for all parties (via ECF)